



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

**JUN - 7 2016**

Ref: 8EPR-N

Ms. Tamara Gertsch, National Project Manager  
Bureau of Land Management  
Wyoming State Office  
P.O. Box 21550  
5353 Yellowstone Road  
Cheyenne, WY 82003

Re: Energy Gateway South Transmission Project  
Final Environmental Impact Statement  
CEQ # 20160104

Dear Ms. Gertsch:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Bureau of Land Management's (BLM) Final Environmental Impact Statement (EIS) for the Energy Gateway South Transmission Project in Wyoming, Colorado and Utah. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Rocky Mountain Power has requested a right-of-way (ROW) authorization to construct, operate and maintain a 500-kilovolt (kV) single circuit, alternating current transmission line that would extend approximately 400 to 540 miles, depending on the route selected, from south-central Wyoming to central Utah, crossing northwestern Colorado. Project components are: (1) the transmission line; (2) two series compensation stations at two separate points between the Aeolus and Clover substations; (3) communication regeneration stations; (4) the rebuilding of two existing 345-kV transmission lines between the Clover and Mona substations in existing ROW; (5) the rerouting of the Mona to Huntington 345-kV transmission line through the Clover substation; (6) relocating approximately 2 miles of the existing Bears Ears to Bonanza 345-kV to parallel the proposed line; and (7) permanent and temporary access roads. The project would transmit about 1,500 megawatts of electricity generated from existing new renewable (e.g., wind and solar) and thermal (e.g., gas, coal) generation sources to meet growing customer needs, ease transmission congestion and improve the flow of electricity throughout the West.

The proposed transmission line crosses federal land – most of which is administered and managed by the BLM. Potential routes for the transmission line identified to date also will cross state, tribal and private lands. Twenty-eight governmental agencies are cooperating agencies. Both the BLM and the applicant agreed on the preferred alternative – WYCO B and COUT C.

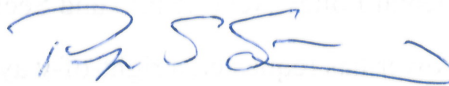
The changes between the Draft EIS and the Final EIS can easily be determined by the reader because they are summarized at the beginning of each chapter and indicated with a solid black line on the left side of the text throughout the document. In addition, the EPA notes that the decrease in distance between the centerlines of parallel transmission lines will provide more flexibility, avoiding or reducing impacts to particularly sensitive or rare resources.

We also acknowledge BLM's responses to our concerns regarding water resources and the changes that have been made in the Final EIS. Because the November 3, 2015, Presidential Memorandum: Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment came out too late to be included in the Final EIS, we recommend considering this new policy in developing the Record of Decision. (See <https://www.whitehouse.gov/the-press-office/2015/11/03/mitigating-impacts-natural-resources-development-and-encouraging-related-private-investment>.)

The EPA supports the mitigation measures listed for air quality on page 3-41, Mitigation Planning. Our comments on the Draft EIS noted concerns with the modeled 1-hour NO<sub>2</sub> impacts. Although elevated impacts were predicted, a conservative screening model was used rather than EPA's preferred model for near-field impact assessment. In the absence of more refined analysis, requiring Tier 3 or better diesel equipment would provide a reasonable assurance that 1-hour NO<sub>2</sub> impacts will not exceed that National Ambient Air Quality Standard (NAAQS).

Thank you for the opportunity to provide comments on the Energy Gateway South Final EIS. If you have any questions or would like to discuss our comments, please contact me at 303-312-6704 or the lead reviewer of this project, Carol Anderson, at 303-312-6058.

Sincerely,



Philip S. Strobel  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation